REMARKS

Applicants have amended claims 1-2, 4, 10-12, 14, 20-22, 24, and 30-35, and have

canceled claims 2-3, 8, 12-13, 18, 22-23, and 28 during prosecution of this patent application.

Applicants are not conceding in this patent application that said amended and canceled claims are

not patentable over the art cited by the Examiner, since the claim amendments and cancellations

are only for facilitating expeditious prosecution of this patent application. Applicants

respectfully reserve the right to pursue said amended and canceled claims, and other claims, in

one or more continuations and/or divisional patent applications.

The Examiner objected to the specification.

The Examiner objected to the drawings.

The Examiner objected to claims 1, 11 and 21.

The Examiner rejected claim 31 under 35 U.S.C. § 112, second paragraph, as allegedly

being indefinite for failing to particularly point out and distinctly claim the subject matter which

applicant regards as the invention.

The Examiner rejected claims 31-36 under 35 U.S.C. § 102(b) as allegedly being

anticipated by Prompt *et al.*, U.S. 2001/0034733.

The Examiner rejected claims 1, 4-7, 9-11, 14-17, 19-21, 24-27 and 29-30 under 35

U.S.C. § 103(a) as allegedly being unpatentable over Prompt *et al.*, in view of Fry, U.S.

2003/0159111.

In a telephonic interview on July 24, 2007 between Examiner Aaron J. Sanders,

Supervising Examiner Pannala, and Applicant's Representative Jack P. Friedman, the following

items pertinent to the office action mailed 07/16/2007 were discussed: objection to the drawings

of FIGS. 5-9B and 11; objection to the title; objection to claims 1, 11, and 21; rejection of claim 31 under 35 U.S.C. § 112, second paragraph, rejection of claims 1, 11, 22, and 31 under 35 U.S.C. § 103(a); and rejection of claim 31 under 35 U.S.C. § 102(b).

Applicant respectfully traverses the specification objection, drawing objections, claim objections, § 112, § 102 and § 103 rejections with the following arguments.

Drawing Objections

The Examiner objected to the drawings.

The Examiner argues: "The drawings are objected to under 37 CFR 1.83(a). The drawings must show every feature of the invention specified in the claims. Therefore, the methods of claims 1 and 21 must be shown or the features canceled from the claims. No new matter should be entered.... Figs. 5-9B and 11 are objected to because code segments are not suitable as drawings of the invention. If Applicant wishes to include code segments, they should be incorporated into the body of the specification as a table or attached as an appendix."

In response, Applicants respectfully contend that FIGS. 5-9B and 11 are proper, because each computer listing in FIGS 5-9B is less than 300 lines. See Patent Rule § 196 ("If the computer program listing is contained in **300 lines or fewer**, with each line of 72 characters or fewer, it may be submitted either as drawings or as part of the specification." (emphasis added)).

In addition, Applicants respectfully point out that incorporation of the drawings into the specification would require massive changes to the specification, including the effect of renumbering the drawings, which may inadvertently introduce errors into the specification.

Accordingly, Applicants respectfully request withdrawal of the drawings objection.

Specification Objection

The Examiner objected to the specification.

The Examiner argues: "The title of the invention is not descriptive. A new title is required that is clearly indicative of the invention to which the claims are directed. The following title is suggested: Generating an Information Catalog for a Business Model."

In response, Applicant have amended the title in accordance with the Examiner's suggestion.

Claim Objections

The Examiner objected to claims 1, 11 and 21 because the phrase "'the business metadata and to form a source tree" in the limitation "wherein prior to the applying step" appears to be incorrect. It appears that the "and" should be deleted.'

In response, Applicants have amended claims 1, 11, and 21 to delete the "and" as suggested by the Examiner.

Accordingly, Applicants respectfully request withdrawal of the objection to claims 1, 11, and 21.

35 U.S.C. § 112, Second Paragraph

The Examiner rejected claim 31 under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

The Examiner argues: "As per claim 31, the phrase "adapted to" is indefinite because it merely recites a use without any active, positive steps delimiting how this use is actually practiced.".

In response, Applicants respectfully contend that active, positive steps are not required for claim 31, because claim 31 is not a method claim, but rather claims a graphical interface. The claim feature of "said graphical interface **adapted to** being navigated by an end user of the method" (emphasis added) recites a characteristic of the graphical interface which, if implemented, would result in an intended use.

Accordingly, Applicants respectfully request withdrawal of the rejection of claim 31 under 35 U.S.C. § 112, second paragraph.

35 U.S.C. § 102(b)

The Examiner rejected claims 31-36 under 35 U.S.C. § 102(b) as allegedly being anticipated by Prompt *et al.*, U.S. 2001/0034733.

Applicant respectfully contends that Prompt does not anticipate claim 31, because Prompt does not teach each and every feature of claim 31. For example, Prompt does not teach the features: "said package list frame comprising means for selecting applications of said computer applications and associated table creators of tables relating to the technical metadata; said object list frame comprising means for selecting tables driven by a computer application and associated table creator selected from the package list frame; said detail frame comprising means for displaying table information relating to a table selected from the object list frame".

The Examiner argues: "Prompt et al. teach ... said package list frame comprising means for selecting applications of said computer applications and associated table creators of tables relating to the technical metadata (See e.g. Fig. 23A where, see [0195], "the second module 1060 can be used to generate, by way of example, a user interface 2301 to display a DIT 2302"); said object list frame comprising means for selecting tables driven by a computer application and associated table creator selected from the package list frame (See e.g. Fig. 23A where, see [0195], "Upon selecting the flat directory view type 2202 from the DVX generator 2200, all of the tables 2310 that are selected are shown in the user interface 2300 of FIG. 23A"); said detail frame comprising means for displaying table information relating to a table selected from the object list frame (See e.g. Fig. 23A where, see [0195], "a user interface 2301 to display a DIT 2302 and a corresponding flat default view 2303 corresponding to a DN for the information displayed 2304 using the third module 1056")."

In response, Applicants respectfully assert that the scope of the recited "means for selecting applications ...", "means for selecting tables ...", and " means for displaying table

information ..." is governed by the description of said mean in Applicants' specification, page 31, line 1 - page 34, line 11, because 35 U.S.C. § 112, sixth paragraph recites: "An element in a claim for a combination may be expressed as a means or step for performing a specified function without the recital of structure, material, or acts in support thereof, and such claim shall be construed to cover the corresponding structure, material, or acts described in the specification and equivalents thereof."

Applicants respectfully assert that the means referred to in Prompt, FIG. 23A and Par. [0195] are not the means or their equivalents described in Applicants' specification, page 31, line 1 - page 34, line 11.

Based on the preceding arguments, Applicant respectfully maintains that Prompt does not anticipate claim 31, and that claim 31 is in condition for allowance. Since claims 32-36 depend from claim 31, Applicants contends that claims 32-36 are likewise in condition for allowance.

35 U.S.C. § 103(a)

The Examiner rejected claims 1, 4-7, 9-11, 14-17, 19-21, 24-27 and 29-30 under 35

U.S.C. § 103(a) as allegedly being unpatentable over Prompt *et al.*, in view of Fry, U.S.

2003/0159111.

Applicant respectfully contends that claims 1, 11, and 21 are not unpatentable over

Prompt in view of Fry, because Prompt in view of Fry does not teach or suggest each and every

feature of claims 1, 11, and 21. Using the arguments in the office action mailed 07/17/2007,

Table 1 *infra* shows Prompt in view of Fry does not disclose 15 of the listed 27 features of

claims 1, 11, and 21 listed in Table 1. Therefore, claims 1, 11, and 21 are not unpatentable under

35 U.S.C. § 103(a) over Prompt in view of Fry. See items marked with * in Analysis column of

Table 1.

Table 1 (Derived From Arguments for Claims 1, 11, 21 in Office Action Mailed 07/17/2007)

Feature	#	Claimed Feature	Analysis
accessing technical metadata	1	data warehouse	DB 106a (Fig. 4)
	2	technical metadata	schema in DB 106a
	3	computer applications	VDS 408
	4	business processes of business model	translates schema from DB 106a (business processes) into virtual directories (business model)
accessing business metadata	5	business metadata	relational objects
	6	first source (of business metadata) outside data warehouse	*first source outside DB 106a not disclosed in Par. 159 or FIG. 10B
	7	business metadata comprising relationships between the business processes and the computer applications	*no disclosure of the relational objects comprising relationships between schema translation processes and VDS 408
	8	business metadata further comprising relationships between the computer applications and the technical metadata	*no disclosure of business metadata comprising relationships between VDS 408 and the schema in DB 106a
accessing presentation metadata	9	presentation metadata	implied by XSL
	10	second source (of presentation metadata) outside data warehouse	*not disclosed (Fig. 17 shows client system which does not include a source of the presentation metadata)
	11	presentation format	determined by XSL
	12	said presentation metadata specifying a presentation format of the technical metadata and business metadata	*no disclosure of presentation metadata specifying a format of the schema in DB 106a and the relational objects

Method step	#	Claimed Feature	Myers Jr. (as argued by Examiner)
applying the presentation metadata	13	information catalog	Directory Information Tree (DIT)
	14	information catalog comprising the technical metadata and the business metadata	*no disclosure that DIT comprises the schema in DB 106a and the relational objects
	15	applying the presentation metadata to the technical metadata and the business metadata to generate the information catalog	*no disclosure of the presentation metadata being applied to schema in DB 106a and the relational objects to generate the DIT
displaying a graphical interface	16	displaying, on an output device for an end user, a graphical interface representing the generated information catalog.	Disclosed in Par. 195
generating a rules base of rules	17	generating a rules base of rules as templates derived from the presentation metadata in the at least one XSL stylesheet	*no disclosure in Par. 142 of rules derived from the presentation metadata that specify a presentation format of the technical metadata and business metadata (i.e., of the schema in DB 106a and the relational objects)
parsing	18	source tree	reconfigured DIT
	19	parsing the technical metadata and the business metadata and to form a source tree such that the source tree comprises the parsed business metadata and parsed technical metadata logically linked to each other	*no disclosure in Par. 85 that the "variety of unrelated relational network data sources" comprises the parsed schema in DB 106a and the relational objects
applying templates and traversing source tree	20	result tree	hierarchical subdirectory in DIT
	21	applying the templates of the rules base and traversing the source tree to form a result tree that includes the logically linked technical metadata and business metadata integrated with the presentation metadata	*no disclosure of forming the hierarchical subdirectory in DIT by applying the templates and traversing the reconfigured DIT; no disclosure of the hierarchical subdirectory in DIT including the parsed schema in DB 106a and the relational objects integrated with the presentation metadata

Method step	#	Claimed Feature	Myers Jr. (as argued by Examiner)
transforming	22	transforming the result tree into the information catalog	*no disclosure of transforming the hierarchical subdirectory in DIT into the DIT
traversing	23	traversing the source tree comprises traversing the entire source tree in accordance with a recursive descent algorithm in which said traversing comprises starting at the root node of the source tree and traversing through the source tree until a leaf node is reached and then returning through the source tree to the root node	*no disclosure of traversing the entire reconfigured DIT in accordance with a recursive descent algorithm (disclosure of recursive inquiries in Par. 14 is not a disclosure of traversing the entire reconfigured DIT in accordance with a recursive descent algorithm)
ascertaining	24	ascertaining whether there is a rule in the rules base for each element in the source tree	Disclosed in Fry, Par. 10
each element having exactly one rule	25	each element having exactly one rule in the rules base, as determined from said ascertaining, is written out in accordance with said exactly one rule during said displaying	*Fry teaches that each element can have more than one template rule but only one rule can be applied.; therefore Fry does not teach "each element having exactly one rule "
each element having no rule	26	each element having no rule in the rules base, as determined from said ascertaining, is written out as text during said displaying	*Par. 195 ("referring to FIG. 23A, the second module 1060 can be used to generate, by way of example, a user interface 2301 to display a DIT 2302") does not teach "each element having no rule"
each element having more than one rule	27	each element having more than one rule in the rules base, as determined from said ascertaining, one or more of said more than one rule is applied to said each element in accordance with a rule hierarchical scheme for determining how said each element is displayed during said displaying	*Fry teaches than an element can have more than one rule, but Fry does not teach "**each element** having more than one rule" (emphasis added)

Based on the preceding arguments, Applicant respectfully maintains that claims 1, 11,

and 21 are not unpatentable over Prompt in view of Fry, and that claims 1, 11, and 21 are in

condition for allowance. Since claims 4-7, 9 and 10 depend from claim 1, Applicant contends

that claims 4-7, 9 and 10 are likewise in condition for allowance. Since claims 14-17, 19 and 20 depend from claim 11, Applicant contends that claims 14-17, 19 and 20 are likewise in condition for allowance. Since claims 24-27, 29 and 30 depend from claim 21, Applicant contends that claims 24-27, 29 and 30 are likewise in condition for allowance.

CONCLUSION

Based on the preceding arguments, Applicants respectfully believes that all pending claims and the entire application meet the acceptance criteria for allowance and therefore request favorable action. If the Examiner believes that anything further would be helpful to place the application in better condition for allowance, Applicant invites the Examiner to contact Applicant's representative at the telephone number listed below. The Director is hereby authorized to charge and/or credit Deposit Account 09-0457 (IBM).

Date: 07/24/2007

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